

446 Haymore Ave. N.  
Worthington, OH 43085

February 18, 2018

Karen Mouritsen  
State Director  
Bureau of Land Management  
Eastern States Office  
20 M Street  
Suite 950  
Washington, D.C. 20003

Dear Director Mouritsen:

I hereby file this Protest of the Bureau of Land Management's ("BLM") planned March 22, 2018 Competitive Oil and Gas Lease and the programmatic Final Environmental Assessment for oil and gas leasing in the Wayne National Forest ("WNF"), Marietta Unit of the Athens Ranger District, Monroe and Noble Counties, Ohio. I formally protest the inclusion of each of the following two parcels covering 345.49 acres:

Parcel # ES-004—03/2018  
39.65 acres in Monroe County

Parcel # ES-005—03/2018  
305.84 acres in Noble County

Information and Interests

EXPRESS PUBLICLY

I am an ordinary Ohio citizen, a member of a family that depends on the WNF for a wide range of activities including hiking, paddling, camping, picnicking, foraging, and the observation of our vanishing biodiversity in something resembling its natural state. It is Ohio's only national forest and one of the few remaining places where it is still possible to have the experience of wilderness which is such an important part of our American heritage. Horizontal hydraulic

fracturing sucks millions of gallons of water out of the forest's watersheds and spews toxins that contaminate the area's streams, aquifers, and wells, degrade its biodiversity, and threaten the health and livelihood of the people who live there. The extractors reap the lion's share of the economic benefits, leaving devastation in their wake, along with the costs of cleaning up after them.

I am also an inhabitant of this planet, and share with you the responsibility to bequeath a livable habitat to our descendants and those of our fellow creatures. We live in a time when it can no longer be honestly disputed that increasing concentrations of atmospheric greenhouse gases produced by fossil fuel use are radically disrupting our planet's climate. The Quaternary alternation of cooler (glacial) and warmer (interglacial) periods that has persisted for the past 2.6 million years threatens to give way to a new epoch of sustained warming, weather events of increasing frequency and destructive power, rising sea levels, and impacts on the quality (and even the possibility) of life that we cannot even imagine. The time is upon us to turn to benign and renewable alternative energy sources and leave the gas, oil, and coal in the ground. The profit to a privileged few and the handful of temporary jobs that their extraction creates does not begin to compensate for the havoc that it wreaks. Instead people should be employed to repair, nourish, and steward our dwindling forests, which we depend on not only for recreation, but to afford forage for our wild flora and fauna, to sequester CO<sub>2</sub>, to keep our soil from washing away, and to keep our air breathable.

## **II. Statement of Reasons the Proposed Lease Sale is Unlawful**

Moreover, BLM's decision to lease the parcels in question for development is flawed and unlawful because of its failure to do due diligence in assessing the consequences for public health, threatened or endangered species, and climate. As amply and minutely documented by the Center for Biological Diversity and other conservation groups in their Protest dated October 12, 2017 of the December 14, 2017 lease sale for other parcels in the WNF Marietta Unit and of the associated Determination of NEPA Adequacy (DNA):

1. BLM failed to prepare an Environmental Impact Statement (EIS) analyzing the impacts of competitive oil and gas leasing in the WNF, and specifically the impacts of leasing the the aforementioned parcels, in violation of the National Environmental Policy Act (NEPA).
2. BLM failed to take a hard look at site-specific, reasonably foreseeable, and cumulative impacts of leasing in the Wayne.
3. BLM's DNA improperly relied on the December 2016 Final Environmental Assessment, Finding of No Significant Impact, and Decision Record for Oil and Gas Leasing in the WNF Marietta Unit to analyze these impacts.
4. BLM failed to analyze the cumulative impacts of oil and gas leasing in connection with the impacts of neighboring pipelines and other infrastruc-

ture associated with fracking in the WNF (in particular risks associated with the Rover Pipeline currently under construction).

5. BLM failed to demonstrate that new oil and gas development in the WNF conforms with the State Implementation Plan for attainment of sulfur dioxide air quality standards under the Clean Air Act.
6. BLM failed to consult with the Fish and Wildlife Service pursuant to Section 7 of the Endangered Species Act on the impacts of leasing on threatened and endangered species in the WNF.
7. BLM improperly relied on an outdated biological opinion to fulfil its Section 7 obligations.

Additionally, there should be a moratorium on new leasing in the WNF until the in-process updating of its Forest Plan is complete.

Sincerely,

A handwritten signature in dark ink, appearing to read "Carl J. Pollard". The signature is fluid and cursive, with the first name "Carl" being more prominent.

Carl J. Pollard

